akerman

Matthew A. Steinberg

Akerman LLP 666 Fifth Avenue 20th Floor New York, NY 10103

D: 212 880 3826 T: 212 880 3800 F: 212 880 8965 DirF: 212 905 6480 matthew.steinberg@akerman.com

November 8, 2017

VIA ECF and EMAIL to ForrestNYSDChambers@nysd.uscourts.gov

The Hon. Katherine B. Forrest
U.S. District Court, Southern District of N.Y.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312225

Re: Kayla Reed v. Squarespace, Inc.

<u>Case No. 1:17-cv-07471</u>

Dear Judge Forrest:

We have just been retained to represent Defendant Squarespace, Inc. ("Squarespace") in the above-referenced matter. Pursuant to Your Honor's Individual Rules of Practice in Civil Cases, we write with Plaintiff's consent to respectfully request (1) a 30-day extension of time for Squarespace to answer, move, or otherwise respond to Plaintiff Kayla Reed's ("Plaintiff") Complaint, **up to and including December 13, 2017**; (2) a 30-day extension of time for the parties to file the Joint Proposed Schedule, **up to and including December 15, 2017**; and (3) an adjournment of the Initial Conference currently scheduled for November 17, 2017 to a date after December 15, 2017 on which the Court is available.

We seek these extensions and the adjournment so that the undersigned counsel can adequately investigate the factual allegations set forth in Plaintiff's Complaint, and so the parties may have the opportunity to substantively discuss the alleged accessibility issues identified by Plaintiff's Complaint. This is our first request for an extension and/or an adjournment.

Thank you for Your Honor's consideration.

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Respectfully submitted,

AKERMAN LLP

/s/ Matthew A. Steinberg Matthew A. Steinberg

cc: Raymond J. Berti, Esq. (via ECF and e-mail)
Marc Edward Dann, Esq. (via ECF and e-mail)
Javier Luis Merino, Esq. (via ECF and e-mail)

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